

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MILWAUKEE ELECTRIC TOOL CORPORATION,)	
)	
)	Case No. 23-cv-4555
Plaintiff,)	
)	Judge
v.)	
)	
THE INDIVIDUALS, CORPORATIONS,)	
LIMITED LIABILITY COMPANIES,)	
PARTNERSHIPS AND UNINCORPORATED)	
ASSOCIATIONS IDENTIFIED)	
ON SCHEDULE A HERETO,)	
)	
Defendants.)	

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff, MILWAUKEE ELECTRIC TOOL CORPORATION (“Plaintiff”), files this Motion requesting leave to file the following documents under seal: (1) Plaintiff’s Schedule A attached to the Complaint, which identifies and includes a list of the Defendant Online Marketplace Accounts; and (2) screenshot printouts showing the active Defendant Internet Stores (Exhibit 2) to the Declaration of Jay Harvey Paragoso.

In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for trademark counterfeiting. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court’s power to grant relief. Once the temporary restraining order has been served on the

relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Respectfully submitted,

Dated: July 14, 2023

By: s/Michael A. Hierl
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MILWAUKEE ELECTRIC TOOL
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Motion for Leave to File Under Seal was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on July 14, 2023.

s/Michael A. Hierl